

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
PECOS DIVISION

FILED

SEP 10 2020

UNITED STATES OF AMERICA,

Plaintiff,

v.

THOMAS SCOTT PERKINS,

Defendant.

§ NO. P-20-CR-

§

§ SEALED

§

§ INDICTMENT

§

§ [Vio: 18 U.S.C. § 2252(a)(4), Possession of

§ Child Pornography; 18 U.S.C. § 2252(a)(2),

§ Distribution of Child Pornography]

§

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
BY ab DEPUTY

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THE GRAND JURY CHARGES:

COUNT ONE

[18 U.S.C. § 2252(a)(4)]

From September 27, 2019 to January 9, 2020, in the Western District of Texas, the  
Defendant,

**THOMAS SCOTT PERKINS,**

did knowingly possess visual depictions of minors engaging in sexually explicit conduct,  
which had been mailed, shipped and transported in interstate and foreign commerce; was produced  
using materials which had been shipped and transported in interstate and foreign commerce; by  
any means including by computer; the production of which involved the use of minors engaging in  
sexually explicit conduct.

A violation of Title 18, United States Code, Section 2252(a)(4).

COUNT TWO

[18 U.S.C. § 2252(a)(2)]

From September 27, 2019 to January 9, 2020, in the Western District of Texas, the  
Defendant,

**THOMAS SCOTT PERKINS,**

knowingly distributed any visual depiction, using any means or facility of interstate or foreign commerce, that has been shipped or transported in or affecting interstate or foreign commerce, by any means including by computer, and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct and the visual depiction of such conduct.

A violation of Title 18, United States Code, Section 2252(a)(2).

**NOTICE OF GOVERNMENT'S DEMAND FOR FORFEITURE**  
**[See Fed. R. Crim. P. 32.2]**

**Child Pornography Violations and Forfeiture Statutes**  
**[Title 18 U.S.C. §§ 2252A(a)(4) & (a)(2),**  
**subject to forfeiture pursuant to Title 18 U.S.C. § 2253(a)]**

As a result of the foregoing criminal violations set forth in Counts One and Two, the United States of America gives notice to Defendant **THOMAS SCOTT PERKINS**, of its intent to seek the forfeiture of any forfeitable property upon conviction and pursuant to Fed. R. Crim. P. 32.2 and Title 18 U.S.C. §§ 2253(a)(1)-(3), which states:

**Title 18 U.S.C. § 2253. Criminal forfeiture**

**(a) Property subject to criminal forfeiture.**-A person who is convicted of an offense under this chapter involving a visual depiction described in section 2251, 2251A, 2252, 2252A, or 2260 of this chapter or who is convicted of an offense under section 2252B of this chapter, or who is convicted of an offense under chapter 109A, shall forfeit to the United States such person's interest in-

- (1)** any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of this chapter, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of this chapter;
- (2)** any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and
- (3)** any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

A TRUE BILL **Original signed by the  
foreperson of the Grand Jury**

FOREPERSON OF THE GRAND JURY

**JOHN F. BASH  
UNITED STATES ATTORNEY**

BY:

  
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JOHN CANNIZZARO  
Assistant U.S. Attorney